

April 8, 2025

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**VIA ECF**

Honorable Frederic Block  
United States District Court  
Eastern District of New York  
225 Cadman Plaza  
Brooklyn, NY 11201

**Re: *Engesser et al. v. McDonald*,  
Civil Action No. 25-cv-01689 (FB) (LKE)**

Dear Judge Block:

We represent Plaintiffs in the above-captioned matter. The Parties met today in intensive discussions for over thirteen hours, in-person, at the offices of Patterson Belknap, and we have made very significant progress toward a joint Stipulation and Proposed Preliminary Injunction on behalf of all Parties (“Stipulation”). At the time of this submission, the Parties are continuing to negotiate, and/or obtain final approval on, a handful of limited final material terms of the Stipulation. We respectfully request the Court’s leave to submit a joint Stipulation by 2:00 p.m. tomorrow, April 9, 2025. In the event the Parties have not reached agreement by that point, we respectfully request that the Court schedule a 4:00 p.m. telephonic or video conference.

Respectfully yours,



Lisa E. Cleary

cc (by email or ECF)  
Caitlin Ross  
Rachel Summer, NYAG  
Samantha Buchalter, NYAG  
Elizabeth Jois, NYLAG  
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